Remarks

This Application has been carefully reviewed in light of the Office Action mailed October 2, 2009. At the time of the Office Action, Claims 1-12 were pending in the application and stand rejected. Applicants respectfully request reconsideration and allowance of all pending claims.

Section 101 Rejections

The Office Action states Claims 1-5 and 11 are rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. In particular, the Office Action states that "providing a defined first key or second key does not meet the transformation test because the steps do not transform electronic data such that the data is has a different function or is suitable for a different use." Office Action at 2 (emphasis added). Applicants respectfully traverse this rejection.

Claim 1 recites, in part:

- determining if the at least one object has a defined first key;
- if the at least one object has a defined first key, providing that defined first key for the at least one object as a naming attribute for the entry corresponding to the at least one object in the directory, the defined first key uniquely identifying the entry in the directory; and
- if the at least one object does not have a defined first key, providing a second key for the at least one object as the naming attribute for the entry corresponding to the at least one object in the directory, the second key uniquely identifying the entry in the directory.

Providing the first and/or the second key, as recited in Claim 1, satisfies the requirements of the "transformation test" as interpreted by the Office Action at least because the provision of the key(s) "transform electronic data such that the data has a different function or is suitable for a different use." Applicants' Specification discloses particular embodiments of electronic keys that, when electronically provided, enable various different functions and uses. For example, Applicants' Specification discloses example electronic keys that resolve what might otherwise be naming clash issues and/or that may enable the reuse of code and structure written for the other objects:

15   UDDI keys may be used for naming where present. UDDI defines keys for many of the important object classes, and these keys are specified as being guaranteed to be unique. This means that the keys can be used as the naming attributes for the objects. Using the UDDI keys as the naming attributes means that there is no need to attempt resolution of naming clashes – that would be required if, for example, the default name were used as the naming attribute for a Business Entity.

20   Keys may be provided for naming where not present. That is, not all UDDI objects have defined keys. An example is Publisher Assertions. For these, the present system provides a key, using the same algorithm as is used for the UDDI-defined keys. This re-use of the idea means that code and structure written for the other objects can be re-used.

Specification at 19, ll. 11-22. At least because Claims 1-5 and 11 satisfy the requirements of the "transformation test" as interpreted by the Office Action, Applicants respectfully request withdrawal of the rejection under 35 U.S.C. § 101 and full allowance of these claims.

Section 103 Rejections

Claims 1-12 are rejected under 35 U.S.C. § 103 (a) as allegedly being unpatentable over U.S. Patent Publication No. 2003/0023957 by Bau, III et al. ("*Bau*") in view of "LDAP Schema for UDDI" to Bergeson ("*Bergeson*"). Applicants respectfully traverse this rejection.

Claim 1 is directed to a method of generating keys for object(s) in a Web Services arrangement. At least one object based on at least one of a plurality of Universal Description, Discovery and Integration (UDDI) objects is stored as an entry in a directory. The directory includes a hierarchical organization of a plurality of entries. Each of the plurality of entries has a plurality of attributes. It is determined if the at least one object has a defined first key. If the at least one object has a defined first key, the defined first key is provided for the at least one object as a naming attribute for the entry corresponding to the at least one object in the directory. The defined first key uniquely identifies the entry in the directory. If the at least one object does not have a defined first key, a second key for the at least one object is provided as the naming attribute for the entry corresponding to the at least one object in the directory. The second key uniquely identifies the entry in the directory. The cited references do not teach or suggest each of the limitations.

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Applicants respectfully submit that independent Claim 1 is allowable at least because the proposed *Bau-Bergeson* combination fails to teach, disclose, or suggest "storing at least one object based on at least one of a plurality of Universal Description, Discovery and Integration (UDDI) objects as an entry in a directory, the directory comprising a hierarchical organization of a plurality of entries, each of the plurality of entries having a plurality of attributes."

The Patent Office concedes that *Bau* does not disclose these limitations. *See, e.g.,* Office Action at 4. *Bergeson* fails to cure the conceded deficiency of *Bau* regarding the above limitations. For example, nowhere does *Bergeson* contemplate "the directory comprising a hierarchical organization of a plurality of entries." In contrast, *Bergeson* merely discloses a schema that provides a relatively simplistic mapping of UDDI objects in a registry to various directory objects. *See, e.g., Bergeson* at Sections 4-4.5.1. This simplistic mapping schema is highly analogous to the "Novell representation" described in the Background section of Applicants' Specification. *See, e.g.,* Specification at 5, ll. 14-32 and Fig. 14. For example, the UDDI object names in *Bergson* are the same as those described in Applicants' Background section. *See, e.g., Bergeson* at Section 4; *see also* Specification at 5, ll. 14-32 and Fig. 14. Applicants' Specification, however, describes the inefficiencies of mapping schemas similar to the "Novell representation" and their inability to address a number of problems that, in certain embodiments, have been addressed by Applicants' claimed invention. *See, e.g.,* Specification at 2, l. 20 to 4, l. 32. For example, one of the important issues that such mapping schemas do not address is "[h]ow to represent UDDI information and requirements in *hierarchy* of Directory objects." Specification at 3, ll. 22-23 (emphasis added).

Furthermore, the Office Action fails to specifically indicate any portion of *Bergeson* allegedly disclosing that the *directory* of *Bergeson* comprises *a hierarchical organization* of a plurality of entries. Instead, the Office Action merely points to the mapping schema of *Bergeson* as disclosed in Sections 4.1.1, 4.2.1, 4.3.1, 4.4.1, and 4.5.1. *See, e.g.,* Office Action at 4. The cited portions of *Bergeson,* however, merely disclose that various UDDI objects "are represented in the directory." *See id. Bergeson* fails to expressly disclose in the cited

portions or elsewhere how the directory is itself is organized, much less that the directory comprises a *hierarchical organization*.

In addition, *Bergeson* fails to inherently disclose that the directory comprises a hierarchical organization. According to the M.P.E.P., "[t]o establish inherency, the extrinsic evidence 'must make clear that the missing descriptive matter is *necessarily* present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill." M.P.E.P. § 2112(IV) (quoting *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999)) (emphasis added). Inherency, however, may not be established by probabilities or possibilities. *Id.* A directory does not *necessarily* have a hierarchical organization. Thus, even if *Bergeson* discloses that UDDI objects may be represented in a directory, such a disclosure does not inherently constitute "storing at least one object based on at least one of a plurality of Universal Description, Discovery and Integration (UDDI) objects as an entry in a directory, the directory comprising a hierarchical organization of a plurality of entries, each of the plurality of entries having a plurality of attributes," as recited in independent Claim 1. The Office Action does not allege that *Bau* cures this deficiency; in fact, the Examiner acknowledges that *Bau* does not disclose this limitation of Claim 1.

Furthermore, Applicants do not admit that the proposed *Bau-Bergeson* combination is possible or that the Office Action provided an adequate reason for combining or modifying the references in the manner proposed by the Office Action.

Claim 6 also includes limitations generally directed to storing at least one object based on at least one of a plurality of Universal Description, Discovery and Integration (UDDI) objects as an entry in a directory, "the directory comprising a hierarchical organization of a plurality of entries." For at least those reasons discussed above with regard to Claim 1, Applicants respectfully contend that the cited references do not teach or suggest the limitations of Claim 6.

For at least these reasons, Applicants respectfully submit that Claims 1 and 6 are patentably distinguishable from the cited references and respectfully request reconsideration and allowance of independent Claims 1 and 6 and their dependent claims.
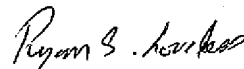
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Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Ryan S. Loveless, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6913.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to **Deposit Account No. 02-0384 of Baker Botts L.L.P.**

Respectfully submitted,

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